

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

MDL No. 3076

Case No. 1:23-md-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

This document relates to:

Multinational VC Defendants

O'Keefe v. Sequoia Capital Operations, LLC, et al., S.D. Fla.
Case No. 1:23-cv-20700

Chernyavsky et al. v. Temasek Holdings (Private) Ltd., et al.,
S.D. Fla. Case No. 1:23-cv-22960

Cabo et al. v. Temasek Holdings (Private) Ltd. et al., N.D. Cal.
Case No. 3:23-cv-03974

**PLAINTIFFS' RESPONSE TO DEFENDANTS
SOFBANK GROUP CORP., SOFTBANK INVESTMENT ADVISERS (UK) LIMITED, AND
SOFTBANK GLOBAL ADVISERS LIMITED'S OPPOSITION TO PLAINTIFFS'
MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY**

Plaintiffs file this response to Defendants SoftBank Group Corp., SoftBank Investment Advisers (UK) Limited, and SoftBank Global Advisers Limited (collectively, “SoftBank”) Opposition (R. Doc. 374) (“Opposition”) to Plaintiffs’ Omnibus Motion to Lift Discovery Stay and for Leave to Conduct Jurisdictional Discovery, and, If Necessary to Amend Their Complaints with Any Facts Arising from Such Discovery (R. Doc. 348) (“Motion”).

Plaintiffs hereby withdraw the motion as to Defendant SoftBank. Because SoftBank has not lodged a personal jurisdiction objection in this litigation at this time and because Plaintiffs have a motion pending before this Court which would obviate the need for any service-related discovery (R. Doc. 280), Plaintiffs did not attach discovery requests to SoftBank to the Motion, did not confer with SoftBank prior to filing the Motion, and do not seek discovery from SoftBank. Plaintiffs thus retract the Motion as to SoftBank at this time. Should SoftBank attempt to assert a personal jurisdiction defense at a later date, Plaintiffs will separately seek jurisdictional discovery from SoftBank or seek leave from this Court to take such discovery, whichever is appropriate at that time.

CONCLUSION

For the foregoing reasons, Plaintiffs pray that the Court will permit them to retract their Motion with respect to SoftBank without prejudice in order to permit Plaintiffs to request jurisdictional discovery against SoftBank at a later date should SoftBank raise a personal jurisdiction defense.

Dated: November 20, 2023

By: /s/ Adam Moskowitz

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 20, 2023, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court, by using the CM/ECF system which will send an electronic notification of such filing to all counsel of record.

By: /s/ Adam M. Moskowitz
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